

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Application of FORENSIC NEWS LLC and
SCOTT STEDMAN for an Order Pursuant to 28
U.S.C. § 1782 to Conduct Discovery for Use in a
Foreign Proceeding.

Case No. 1:22-mc-347-AT

**DECLARATION OF SHLOMO RECHTSCHAFFEN
IN FURTHER SUPPORT OF WALTER SORIANO’S MOTION
TO INTERVENE, OPPOSITION TO PETITIONERS’ APPLICATION
PURSUANT TO 28 U.S.C. § 1782, AND, IN THE ALTERNATIVE, MOTION TO STAY**

I, Shlomo Rechtschaffen, pursuant to 28 U.S.C. § 1747, declare as follows:

1. I am a Solicitor in England and Wales, admitted in 2 August 2004. I am currently the principal at Rechtschaffen Law Offices.
2. I represent Walter Soriano in a proceeding brought against Forensic News LLC, Scott Stedman, and others (the “UK Action”) that is pending in the High Court of Justice, Kings Bench Division in England (the “High Court”).
3. I submit this Declaration in further support of Mr. Soriano’s Motion to Intervene, Opposition to Petitioners’ Application Pursuant to 28 U.S.C. § 1782, and, in the Alternative, Motion to Stay (the “Motion”).
4. On January 19, 2023, Mr. Soriano filed an Anti-Suit Injunction Application with the High Court in the UK Action (the “Anti-Suit Injunction”).
5. Attached hereto as **Exhibit A** is Mr. Soriano’s “Skeleton” argument for 6 February 2023 hearing in the Anti-Suit Injunction.

6. On February 10, 2023, the High Court entered a ruling denying the Anti-Suit Injunction, which is attached hereto as **Exhibit B**. Mr. Soriano intends to seek an expedited appeal of that ruling.

I declare under penalty of perjury under the laws of the United States of America the foregoing is true and correct. Executed February 10, 2023.



Shlomo Rechtschaffen